

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
NEW ALBANY

SHAUNNE OLSON,

Plaintiff,

-vs-

Case No: 4:06-CV-0154-SEB-WGH

HORNBLOWER MARINE SERVICES, INC.,

Defendant.

_____ /

PLAINTIFF'S MOTION FOR MAINTENANCE AND CURE

NOW COMES Plaintiff moving as aforesaid for the following reasons:

On or about June 13, 2006, Plaintiff was discharged from Defendant's vessel, the HSV Westpac Express in Okinawa, Japan unfit for duty, and has yet to reach maximum medical improvement, or receive maintenance and cure.

WHEREFORE Plaintiff prays this Honorable Court order Defendant to pay Plaintiff maintenance and cure retroactively and prospectively until he reaches maximum medical improvement.

O'BRYAN BAUN COHEN KUEBLER

/s/ Dennis M. O'Bryan

Dennis M. O'Bryan (P30545)
Attorney for Plaintiff
401 S. Old Woodward, Ste. 320
Birmingham, MI 48009
(248) 258-6262
(248) 258-6047
dob@obryanlaw.net

DATED: January 19, 2007

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 19th day of January, 2007 the foregoing was filed using the Court's ECF Filing System and will be served on counsel for Defendant, Stephanie R. Miller, through the Court's ECF system.

/s/ Dennis M. O'Bryan
